

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

BASS STORAGE, LLC,	:	
	:	
	:	
Plaintiff,	:	
	:	CASE NO.
v.	:	
	:	
SALTWATER BUILDERS, LLC, and	:	
SALTWATER FABRICATIONS, LLC	:	
d/b/a SALTWATER BUILDERS, LLC	:	
	:	
	:	
Defendants,	:	
	:	

COMPLAINT

COMES NOW, Plaintiff, Bass Storage, LLC, in the above-styled action, and file this, their Complaint, against Defendants Saltwater Builders, LLC and Saltwater Fabrications, LLC d/b/a Saltwater Builders, LLC, showing the Court the following:

1.

This is breach of contract case. On or about November 28, 2023, Plaintiff and Defendants entered into a contract for construction of a main covered dock and restaurant dock to be completed at Bass Storage, LLC's premises in Baldwin County, Georgia for \$1,512,650.00.

2.

Plaintiffs state the intention to bring each and every claim permissible under Georgia law, and seek all applicable special damages, economic losses, consequential damages, necessary expenses, and all applicable compensatory, special, actual, and general damages permissible under Georgia law.

3.

Plaintiff is a Georgia corporation licensed to do business in the State of Georgia. At all times relevant to the subject incident, Plaintiff was domiciled in Georgia.

4.

Defendants Saltwater Builders, LLC and Saltwater Fabrications, LLC, are foreign limited liability companies that transact business in Georgia, entered into a contract in Georgia, and agreed to perform work in Baldwin County, Georgia. *See* O.C.G.A. § 9-10-91.

5.

Defendant Saltwater Builders, LLC may be served through its registered agent, Forrest B. Bolling-Cothron at 13748 NW Hwy 19, Chiefland, FL 32626. Defendant Saltwater Fabrications, LLC through its registered agent, Forrest B. Bolling-Cothron at 13748 NW Hwy 19, Chiefland, FL 32626.

6.

Defendants Saltwater Builders, LLC and Saltwater Fabricators, LLC have been properly served with sufficient process in this action.

7.

The State of Florida is Defendant Saltwater Builders, LLC and Saltwater Fabricators, LLC's state of incorporation and the home of their principal office.

8.

This action is a civil action with a claim of which this Court has proper and original jurisdiction. *See* 28 U.S. Code § 1332. There is complete diversity among the parties, plaintiff has different state citizenship and domicile than Defendants, and the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

9.

By virtue of the facts alleged herein, venue and jurisdiction are proper in this Court as to Defendants.

10.

Defendants agreed to manufacture and install docks at Plaintiff's premises in Baldwin County, Georgia approximately 14-16 weeks after receipt of the initial payment. Ex. 1, Contract. Said payment was made and received on December 1, 2023.

11.

As portions of the work were completed, additional payments were made.

12.

The project fell behind schedule. And Defendants then promised an approximate completion date of January – February 2025.

13.

The project was not completed in January-February of 2025 and Defendants have done no work on the site in months.

14.

As of today's date, July 23, 2025, over \$1,000,000 has been paid to Defendants. However, none of the main docks are functional and significant portions have not been delivered to the site.

15.

As a result of Defendants' failure to timely complete the project, Plaintiff has suffered significant financial damages due to loss of use of the docks to be constructed.

16.

Despite having been paid for over two-thirds of the project, Defendants have not completed any of the main dock project in a usable form nor has it delivered significant portions of the

material necessary for the main dock project.

17.

In June and July of 2025, Defendants were requested to provide a plan for completion of the project and failed altogether to present any plan at all.

18.

Defendants has breached their contract with Plaintiff to provide docks as required by the contract.

19.

Plaintiff has been deprived of the use of dock slips for over 1 year due to Defendants' failure to timely complete the project. As a result, Plaintiff is losing over \$150,000 per year due to Defendants' delay. These damages continue to accumulate.

20.

In addition, over \$700,000 has been paid to Defendants for docks not completed. Plaintiff owes 4.5% per annum for these funds and has suffered damages in excess of \$30,000 which continue to accumulate as the project is not completed.

21.

Plaintiff is entitled to damages caused by Defendants' delay as well as a refund for monies paid for work not performed.

22.

Plaintiff is entitled to and does request attorney's fees and the expenses of litigation in that the actions on the part of the Defendants as herein above-described show that the Defendants have acted in bad faith in the transactions and dealings surrounding the herein above-described incident. Defendants have been stubbornly litigious and has caused the Plaintiff unnecessary expense so as

to entitle Plaintiff to the expenses of litigation and attorney's fees as defined by O.C.G.A. § 13-6-

11. Defendants have acted in bad faith and has forced Plaintiff to file this lawsuit in order to receive compensation for Plaintiff's damages and injuries.

WHEREFORE, Plaintiff prays for the following:

- (a) that Summons and Process issue and be served upon defendants as provided by law;
- (b) that Plaintiffs be awarded actual damages in amounts to be shown at trial from the Defendants;
- (c) that Plaintiff be awarded all general, special, compensatory, economic, and other allowable damages in accordance with the enlightened conscience of an impartial jury from the Defendants and as permitted under Georgia law;
- (d) that Plaintiff be awarded a bench trial; and
- (e) that Plaintiff have such other relief as this Court deems just and appropriate under the circumstances.

THE KING FIRM

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